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10 Attorneys for Creditor,  
11 HOUSER BROS. CO. dba RANCHO DEL  
12 REY MOBILE HOME ESTATES

13 UNITED STATES BANKRUPTCY COURT

14 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

15 In re  
16 JAMIE LYNN GALLIAN,  
17 Debtor.

18 Case No. 8:21-bk-11710-SC

19 Chapter 7

20 DECLARATION OF D. EDWARD HAYS RE:  
21 REQUEST FOR HEARING ON DEBTOR'S  
22 MOTION TO CONVERT CASE UNDER 11  
23 U.S.C. §§ 706(a) OR 1112(a)

24 [NO HEARING SET]

25 I, D. EDWARD HAYS, say and declare as follows:

26 1. I am an individual over 18 years of age and competent to make this Declaration.  
27  
2. If called upon to do so, I could and would competently testify as to the facts set forth  
28 in this Declaration.  
29  
3. The facts set forth below are true of my personal knowledge.  
40  
4. I am a founding partner of Marshack Hays Wood LLP, attorneys of record for Houser  
41 Bros. Co. dba Rancho Del Rey Mobile Home Estates (“Houser Bros.”).

5. I make this Declaration in connection with Houser Bros.’s request for hearing on the “Motion to Convert Case Under 11 U.S.C. §§ 706(a) or 1112(a)” (“Motion”), filed by Jamie Lynn Gallian (“Debtor”) on September 10, 2024, as Docket No. 438.

6. On September 23, 2024, as Docket No. 449, Houser Bros. filed an “Opposition to Debtor’s Motion to Convert Case under 11 U.S.C. § 706(a)” (“Opposition”). Houser Bros.’s Opposition contained a request for hearing on the Motion pursuant to Local Bankruptcy Rule 9013-1(o)(1)(A)(ii).

7. To date, Debtor has not scheduled or given notice of any hearing on the Motion. Houser Bros. will accordingly lodge an order to deny the Motion pursuant to Local Bankruptcy Rule 9013-1(o)(4).

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
October 22, 2024.

/s/ D. Edward Hays  
D. EDWARD HAYS

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **DECLARATION OF D. EDWARD HAYS RE: REQUEST FOR HEARING ON DEBTOR'S MOTION TO CONVERT CASE UNDER 11 U.S.C. §§ 706(A) OR 1112(A)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 22, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **October 22, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN UNIT 376  
HUNTINGTON BEACH, CA 92649

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **October 22, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY:**

PRESIDING JUDGE'S COPY  
HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
411 WEST FOURTH STREET, SUITE 5130 /  
COURTROOM 5C  
SANTA ANA, CA 92701-4593

**VIA EMAIL:**

DEBTOR  
JAMIE LYNN GALLIAN  
jamiegallian@gmail.com

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 22, 2024 Layla Buchanan  
Date Printed Name

/s/ Layla Buchanan  
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** Bradford Barnhardt bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** Aaron E DE Leest adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS' ASSOCIATION:** Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **CHAPTER 7 TRUSTEE JEFFREY I GOLDEN (TR):** Jeffrey I Golden (TR) lwerner@wglp.com, jig@trustesolutions.net; kadele@wglp.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR AND PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS' ASSOCIATION:** Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
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- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO. and CREDITOR HOUSER BROS. CO. DBA RANCHO DEL REY MOBILE HOME ESTATES:** Laila Masud lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR DEFENDANT RANDALL L NICKEL:** Mark A Mellor mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com
- **INTERESTED PARTY COURTESY NEF:** Valerie Smith claims@recoverycorp.com
- **U.S. TRUSTEE:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

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